

My comments are directed specifically towards the refarming of the Novice and Tech-Plus telegraphy subbands proposed by the ARRL:

1. I agree with the ARRL that the subbands should be reallocated.
2. I disagree with the ARRL's conclusions drawn from their survey.
3. I disagree with their proposed reallocation plan in the 80, 40 and 15 meter bands.

Let me first say that I hold the ARRL in high regards for their support they provide to the Amateur community. I am also a member of the ARRL. However, in this case I believe they have ignored the facts and their own survey. The telephony mode continues to be the most popular mode of communications and its use continues to grow daily. Their proposal continues the old die-hard stance not to give up one inch of CW spectrum (not used by 26%) to accommodate the overcrowding in the phone segments of the bands. It does not take a survey to hear the dead air in many parts of the CW & data spectrum currently allocated. Additionally, the other reality is digital communication (not used by 40%) has not grown in popularity. Again it is obvious, the fight is the same as during the past restructuring proceeding - keep CW at the forefront of the ARRL agenda.

I would agree with the proposal to the extend that both Novices and Techs with Element 1 credit be allowed to operate at a 200 watt limit within the CW and data portions of refarmed or unchanged afforded to holders of general class license operators.

The FCC needs to take a bold approach to the phone reallocations in the 80, 40, 20, 15 and 10 meter bands. I would support the following phone reallocation:

80 m

General - 3800 to 4000  
Advanced - 3775 to 4000 (No Change)  
Extra - 3700 to 4000

40 m

General - 7150 to 7300  
Advanced - 7125 to 7300  
Extra - 7075 to 7300

20m

General - 14200 to 14350  
Advanced - 14175 to 14350 (No Change)  
Extra - 14125 to 14350

15m

General - 21300 to 21450 (No Change)  
Advanced - 21225 to 21450 (No Change)  
Extra - 21175 to 21450

10 m

Novice/Tech-Plus - 28300 to 28500 (No Change)  
General - 28300 to 29700 (No Change)  
Advanced - 28300 to 29700 (No Change)  
Extra - 28275 to 29700

The FCC's actions during the restructuring had a positive impact to

the Amatuer Service. Again you have an opportunity to provide an incentive for operators to upgrade their technical skills and improve the overall quality of the Amateur Radio Service. Thank You